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Feb. 10, 2006

Re: Comments of the American Gas Association on
EPA's "Spill Prevention, Control, and Countermeasure Guidance
For Regional Inspectors"

Ladies and Gentlemen:

The American Gas Association (AGA) submits the following comments in response to EPA's request for comments on the "Spill Prevention, Control, and Countermeasure Guidance for Regional Inspectors" (SPCC Guidance) dated November 28, 2005. AGA is a member of the Utility Solid Waste Activities Group (USWAG) and has joined in comments filed by USWAG on the SPCC Guidance.

AGA submits this separate comment letter to discuss in greater detail our request that EPA amend the SPCC Guidance to clarify the specific types of natural gas pipeline and distribution system facilities that are "transportation-related facilities" that are not subject to the SPCC rule for non-transportation related facilities. AGA submitted similarly detailed information in its January and February 2004 letters to EPA's Oil Programs Director, in which AGA asked EPA to clarify the SPCC exemption for transportation-related facilities. AGA is updating and resubmitting this information to ensure that it is included in the record of comments on the November 2005 Guidance.

The American Gas Association, founded in 1918, represents 197 local energy utility companies that deliver natural gas to more than 56 million homes, businesses and industries throughout the United States. AGA's members account for roughly 83 percent of all natural gas delivered by the nation's local natural gas distribution companies. AGA is an advocate for local natural gas utility companies and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international gas companies and industry associates. Natural gas meets nearly one-fourth of the United States' energy needs. Our Association is sharply focused on assisting its member utilities obtain and deliver stable supplies of clean-burning natural gas, safely and reliably. For more information, go to www.aga.org.

I. Transportation Exemption

A. Request to List Certain Facilities as Transportation Related

AGA requests that EPA clarify the scope of natural gas "transportation" facilities that are not subject to the Oil Spill Prevention Control and Countermeasure (SPCC) Regulations for *Non*-Transportation facilities. Specifically, we are asking EPA to clarify that the following natural gas pipeline and distribution facilities are exempt from the SPCC rule as transportation-related facilities. It is AGA's position that these facilities are exempt transportation facilities. However, assuming for the sake of argument that EPA does have jurisdiction to impose the SPCC rule over facilities that transport products other than oil, as EPA asserts in its guidance at pages 2-6 and 2-9, AGA requests that EPA explain in the Guidance that EPA agreed with DOT in the EPA-DOT Memorandum of Understanding (MOU) that EPA will not assert its SPCC jurisdiction over the following natural gas pipeline and distribution facilities, including equipment and tanks that are hard-piped to the cathodically protected, pressurized system. In addition, AGA requests that EPA revise section 2.3 on page 2-6 of the Guidance and table 2.2 on page 2-9 to include the following list of facilities as examples of "transportation-related facilities (DOT Jurisdiction)" under the 1971 DOT-EPA Memorandum of Understanding.

1. **Natural gas pipelines, including interstate and intrastate transmission lines and local utility distribution mains;**
2. **Natural gas pipelines and piping within compressor stations, take stations, city gate stations, and natural gas storage facilities that are incident to transportation (e.g. LNG and underground storage facilities);**
3. **Natural gas compressors, including hard-piped lube oil systems and piping;**
4. **Natural gas cleaning equipment, including drips, scrubbers, separators and filters; and**
5. **Tanks that are hard–piped into the pressurized natural gas transmission or distribution system and its cathodic protection, such as condensate tanks hard-piped to gas cleaning equipment.**

AGA appreciates that in the SPCC Guidance, EPA has already listed natural gas pipelines as examples of "transportation facilities," that are not subject to the SPCC rule, but this description is too vague to give inspectors and operators sufficient notice of the types of equipment within the pipeline and distribution systems that are or are not covered by the SPCC rule for non-transportation related facilities. Therefore, AGA is requesting that EPA clearly include the list

above as examples of transportation related facilities that are not subject to the SPCC rule.

In contrast, note that AGA is not asserting an SPCC rule transportation exemption for *separate* or "break out" condensate tanks at atmospheric pressure that are *not* hard piped to the pressurized natural gas transmission or distribution system. This type of tank should be distinguished from condensate tanks that are hard piped to the cathodically-protected pressurized system.

B. Support for AGA's Requested Clarification

1. Detailed Descriptions of Natural Gas Transportation Activities & Equipment

a. Transporting Natural Gas in Pipes

Natural gas is transported almost entirely by pipe in the ground. Nearly all the natural gas used in this country is produced in the United States and Canada and is transported to customers by pipeline.

To make the natural gas move through the pipes, operators must compress the gas. In other words, they apply pressure at one end of the pipe, and periodically renew the pressure along the way, in order to push the natural gas stream (and entrained liquid oily pipeline condensates) from one place to another. It takes more pressure and larger pipe diameters to transport large volumes of natural gas from producing regions to customers in distant states. Interstate natural gas transmission lines typically have diameters of 20 to 42 inches and operate at pressures of 150 to 2000 pounds per square inch (psi). Natural gas local distribution companies that operate in large states also must transport large volumes of natural gas across many miles within their state territories to move the gas from the "take points" where they take custody of the natural gas stream from their pipeline suppliers, to the "city gate stations" where the gas is transferred to a local distribution system that serves business and homeowner customers in a city or suburb at lower pressures.

Local distribution "main" pipes typically have diameters of around 2-20 inches. Distribution mains usually operate at lower pressures, around ¼ psi – 60 psi. Some mains have pressures at or near the pressure at which the gas is delivered through smaller "service lines" into homes (i.e. from ¼ psi to 5 psi). Service lines to commercial customers will usually be larger and the delivery pressure higher to accommodate the larger volume of gas used by the business customer. A service line typically runs from the distribution main in the street to the meter in the home or business, and is typically ½ inch - 4 inches in diameter for a residential service line. See attached AGA brochure

As reported to the Department of Energy (DOE) Energy Information Administration (EIA) in 2003 for calendar year 2002, there are 309,507 miles of high-pressure natural gas transmission lines in the U.S., and 1,079,566 miles of distribution main lines in the U.S.

Many natural gas pipeline companies and gas utilities also acquire large volumes of natural gas when demand and prices are relatively low (typically in the spring and summer) and store the gas temporarily until needed to serve customers during the winter peak heating season. Facilities for such seasonal storage incident to transportation include underground geological formations, above ground tanks, and LNG facilities. Propane peak shaving plants also help to supplement natural gas service during the peak winter season and are another form of gas storage incident to transportation. Seasonal storage is an important component of ensuring that the pipelines and utilities can reliably transport enough natural gas to serve customer demand during the winter peak. These natural gas storage facilities are regulated transportation facilities under the OPS pipeline safety regulations in 49 C.F.R. Parts 192 and 193. EPA has recognized that such storage facilities are "transportation" facilities that are exempt from the Clean Air Act section 112(r) Risk Management Plan (RMP) rule. See 40 C.F.R. Part 68, §68.3 and 63 Fed. Reg. 639, 642 (Jan. 6, 1998) (definition of "stationary source" exempts natural gas "transportation" including storage incident to transportation).

The Department of Transportation (DOT) Office of Pipeline Safety (OPS) – now within the new Pipeline and Hazardous Substances Administration (PHMSA) -- regulates the construction, installation, operation, corrosion protection, testing, and repair of natural gas transmission lines, distribution lines, and related natural gas storage facilities to ensure safety and to prevent leaks of natural gas. These same measures help prevent leaks of any entrained liquid or oily condensates from transmission lines and distribution mains.

It seems obvious to AGA and its members that natural gas transmission and distribution pipes and related seasonal storage facilities are "transportation" facilities that should not be subject to the SPCC rule for "non-transportation" facilities.

Natural gas compressor stations, take stations and city gate stations often have a complex system of piping that routes the natural gas in and out of the compressor station from multiple supplier lines to lines that transport the pressurized gas to load centers. In February 2004, AGA provided the EPA Oil Programs Office with a complimentary copy of a standard textbook that describes natural gas compressor stations, Gas Engineering and Operating Practices (GEOP) Series, Vol. II, Transmission: Compressor Station Operations (AGA 1985). See e.g. GEOP T-2 at pages 109-111 (schematic drawing and photograph). This piping is also an integral part of the natural gas transportation system. Our members are concerned that it could be a nightmare to try to apply the SPCC requirements to such complex piping. We urge you to clarify the Guidance to recognize that piping in such stations is part of the natural gas transportation system.

b. Compressing Natural Gas To Transport It

Natural gas cannot be transported through the miles of transmission and distribution lines and into and out of natural gas transportation storage facilities

unless the gas is pressurized through “compression.” This is an essential part of the transportation activity.

There are two components in a compressor that use oil: the compressing equipment and the engine or turbine that runs the compressing equipment. Different types of prime movers can be used to compress natural gas. These include but are not limited to reciprocating internal combustion engines, gas turbines, and electric engines. Most compressors use natural gas as their source of fuel. See GEOP T-2, at page 22. Depending on size, the engine could contain 150 to 800 gallons in the crankcase. Regular motor oil is often used as a lubricant for the engine. Some companies use a water-based lubricant -- that is not an oil -- for their compressing equipment. Each compressor may be supplemented by a hard-piped Day Tank of lubricating oil typically having a capacity of 60 gallons, located adjacent to the compressor. In some large underground natural gas storage facilities or LNG facilities, there may be a common sump for lube oil supplying more than one compressor. One member company for example has a common lube oil sump at their LNG plant having a capacity of 1600 gallons.

We urge you to clarify that natural gas compressors, including lube oil system and piping, are transportation facilities that are not subject to the SPCC rule. See GEOP T-2 at pages 83-88 for a description, schematic drawings and photographs of compressor lube oil systems.

c. Gas Cleaning

The activity of gas cleaning is also an essential function for transporting natural gas. But for gas cleaning equipment, our members could not transport natural gas. Almost all natural gas streams carry some amount of liquid or solid impurities, which can include small amounts of impurities such as crude oil, hydrogen sulfide, or dirt. Impurities would clog or corrode the compressors and other equipment necessary for moving our product, and the whole system would grind to a halt. As explained in the recognized textbook, Transportation Compressor Station Operations, “[i]t is extremely important that careful consideration be given to the selection, installation, and maintenance of adequate gas cleaning facilities . . . to protect the compressors from serious problems that result from operating with dirty gas” which in extreme cases can include “total destruction of the unit.” See page 120. Gas cleaning equipment is necessary to maintain the system’s ability to transport natural gas efficiently, reliably and without reductions in pumping and delivery capacity. See pages 120-121.

Drips are pieces of equipment connected to and part of the pressurized pipeline that extract oily condensate and allow for its collection. These drips are often connected to piping leading to a pressurized hard-piped tank.

In addition to simple drips, there are three major types of gas cleaning equipment: separators, scrubbers and filters. All are typically operated under pressure and cannot be easily opened and tested as may be required by some

provisions of the SPCC rule. For example, at a typical natural gas "take station" where a natural gas local utility takes custody of the natural gas stream from the supplying high pressure pipeline, the gas utility first reduces pressure somewhat to the pressure required for that portion of its distribution system. This step down in pressure can often cause impurities to condense out of the gas stream. Oil, water, dirt, and corrosive impurities must be removed before the natural gas reaches the utility's operating equipment. The utility will typically clean the gas at that point to protect its equipment. An added reason for separating oily liquids at this point, where natural gas is entering the utility from an upstream supplier, is to remove and test the condensates for the presence of polychlorinated biphenyls (PCBs) at concentrations of 50 ppm or more, if there is a history of PCBs in the supplier's system. EPA's PCB rule under 40 C.F.R. Part 761 regulates the management, storage, and disposal of PCB liquids above that threshold in natural gas pipeline systems (defined to include gas distribution systems).

Pressurized Hard-Piped Tank: Upon occasion, the stream of gas in a pipeline may contain a "slug" or larger than normal amount of oily condensate liquids. Gas cleaning equipment is needed to separate out the slug of oily liquid from the pressurized natural gas. Such a slug would quickly overwhelm the filters or other gas cleaning equipment if the gas cleaning equipment were not hard piped to a tank with adequate capacity for such slugs. Such tanks typically range in capacity from 1,500 to 10,000 gallons, depending on the size of the facility and volume of natural gas being transported through it. Otherwise, the liquid backing up in the gas cleaning equipment would trigger a safety valve that would shut down the system and prevent natural gas deliveries to customers. The tank is necessarily also under pressure, as the stream of liquids from the gas cleaning equipment is under pressure. It is not feasible to test or sample the tank as contemplated by the SPCC rule because the tank and associated piping are part of the pressurized transportation system, and maintaining the pressure is necessary to continue reliable delivery of natural gas. Note that such tanks may be above ground or underground. Because they are hard piped to the natural gas pipeline and associated gas cleaning equipment, the cathodic protection reaches the hard piped tanks and protects them from corrosion. We urge you to clarify the Guidance to explain that such tanks are transportation facilities that are not subject to the SPCC rules for non-transportation facilities.

Un-Pressurized Tanks Hard-Piped to Gas Cleaning Equipment: In some cases, a company may have a gas pressure regulator that steps down pressure from the first pressurized liquids tank to a second tank that can hold the liquids at normal atmospheric pressure and permit sampling (e.g. for the presence of PCBs). However, even in the case of the atmospheric tank, if it is hard piped to the pressurized tank and used as back up capacity, then it is also necessary for transporting natural gas, because it helps to prevent the liquids from backing up and tripping the safety valve that would shut down the flow of natural gas and stop the transportation of natural gas until the liquids can be removed. Such tanks may be located above ground or underground, and because they are hard piped into the natural gas pipeline system, they are protected from corrosion by cathodic protection. We urge you to clarify the Guidance to explain that such

hard-piped atmospheric tanks are also transportation facilities that are not subject to the SPCC rules for non-transportation facilities.

Distinguish Separate Break-Out Condensate Storage Tanks: On the other hand, in some cases, there may be a separate atmospheric tank that is not hard-piped to the pressurized system, does not serve as a back up to the gas cleaning function, is not covered by the system cathodic protection, and which if it filled up would not affect the delivery of natural gas. For example a tank could be used to store quantities of liquid condensate removed from several pipeline "drips" into drums or other containers and then emptied into the separate tank. We do not consider such separate non-hard piped storage tanks to be part of the transportation activity. They should be listed as non-transportation facilities and clearly distinguished from hard piped tanks that are transportation related. The *key distinction* is that unlike the tanks described above, a separate condensate storage tank is *not hard piped into the pressurized system, is not cathodically protected, and cannot directly impact the flow of natural gas.*

d. Spill Prevention Controls Inherent to Natural Gas Operations

The DOT OPS requires natural gas transmission and distribution companies to construct and operate their facilities to prevent leaks, fires and other risks to safety. Many of these safety measures also help prevent oily substances (e.g. lubricating oil or pipeline condensates) from leaking, or from reaching any water body in the event of a spill. For example, compressors are installed in a building with a concrete slab. See GEOP T-2 at page 18 (diagram of a typical compressor building). In addition, gas cleaning equipment and related condensate storage equipment is typically located on a thick layer of gravel. See attached photographs of scrubbers and separators. As in the case of electrical equipment placed on gravel, placing natural gas equipment on a layer of gravel helps control weeds, reduce fire hazards, and slows down the movement of an oily spill so that it is easier to contain and remove.

2. Definitions

In previous meetings, EPA has asked whether there are any regulatory definitions in the DOT Office of Pipeline Safety's rules for terms such as pipeline, compressor, scrubber, or drip that you could cross-reference.

Title 49 of the Code of Federal Regulations Part 192, section 192.3 of the OPS Regulations for "Transportation of Natural and Other Gas By Pipeline: Minimum Federal Safety Standards" defines the terms pipe, pipeline, gathering line, transmission line, and distribution line.

Section 192.3 defines the term "**pipeline facility**" as "new and existing pipelines, rights-of-way, and any equipment, facility, or buildings used in the transportation

of gas or in the treatment of gas during the course of transportation." This term includes natural gas compressors and gas treatment or cleaning equipment such as separators, scrubbers, drips, and tanks that are hard piped into the compressors or gas cleaning equipment.

Section 192.3 also defines "**Transportation of gas**" to mean "the gathering, transmission, or distribution of gas by pipeline or the storage of gas, in or affecting interstate or foreign commerce." See 49 C.F.R. §192.3.

Although Part 192 does not define the terms **"compressor," "scrubber" or "separator"** in section 192.3, an alternative would be to cross-reference the process of removing liquids at compressor stations, as described and regulated in section 192.165.

A standard textbook for natural gas engineers provides detailed descriptions of the equipment typically used in compressor stations. See GEOP T-2 at pages 39. In February 2004, AGA provided the EPA Oil Programs Office with a complimentary copy of the book, Gas Engineering and Operating Practices (GEOP) Series, Vol. II, Transmission: Compressor Station Operations (AGA 1985). See pages 22-46, 61 (descriptions, diagrams and photographs of compressors) and pages 120-26 (descriptions, diagrams and photographs of gas cleaning equipment including separators, scrubbers and filters).

Natural Gas Transportation Exemptions in Other EPA Rules: Other EPA regulations also define the distinction between transportation and non-transportation facilities in the natural gas industry. For example, EPA's Risk Management Plan (RMP) regulation exempts natural gas pipelines and DOT-regulated pipeline facilities, including storage facilities incident to transportation. See Clean Air Act section 112(r) Risk Management Plan regulations, 40 C.F.R. Part 68. In 40 C.F.R. §68.3, under the definition of "stationary source," EPA clarified that stationary sources subject to the 112(r) rule do *not* include: "transportation, including storage incident to transportation, of any regulated substance …."

Section 68.3 also states that the term "*Transportation* includes, but is not limited to, transportation subject to oversight or regulation under 49 CFR parts 192, 193, or 195, or a state natural gas … program for which the state has in effect a certification to DOT under 49 U.S.C. section 60105. A stationary source does not include naturally occurring hydrocarbon reservoirs." In the preamble to the final 112(r) rule, EPA explained that exempt "Transportation" and storage facilities include Liquefied Natural Gas (LNG) facilities, underground natural gas storage facilities, and other natural gas storage facilities. 63 Fed. Reg. 639, 642 (Jan. 6, 1998).

Industry Terms of Art: In addition, the terms "compressor," "separator," or "scrubber" are well-understood terms in the industry.

A **"compressor**" is generally understood to be a pump driven by a motor that increases the pressure of natural gas from a lower pressure to a higher pressure in order to transport it from one place to another or for delivery to storage or customers. A compressor includes both the pump and the motor that drives it.

A "**scrubber" or "separator**" is a pressurized vessel that removes impurities (liquid or solid) from the gas stream. It is usually located at the inlet of a compressor or at points of delivery along a pipeline.

For a more detailed description of gas compression and gas cleaning, see GEOP T-2 at pages 39-46 and 120-130.

Gas Cleaning Operations: There are three major types of gas cleaners: separators, scrubbers, and filters. A separator is a type of gas cleaner that uses gravitational, inertial, or centrifugal forces to separate liquid or solid impurities from the natural gas stream. See GEOP T-2 at page 121. A gas scrubber will often use some of the same mechanisms of a separator, but unlike a separator, a scrubber also uses some additional media to remove impurities. See pages 121-22. Some gas cleaning equipment also uses a filter media made of a natural or man-made material. See page 125.

Broad Definitions Are Preferable: AGA would prefer that EPA use a broad definition of compressor and gas cleaning facilities, perhaps "including but not limited to" a list of specific types of equipment. This would allow greater flexibility to use new and different types of compression and gas cleaning as they are developed. Otherwise, the SPCC Guidance could inadvertently lock-in old technology and prevent innovation or improvements in energy efficiency.

3. Discharge History

2001-2005 Data

In a recent survey, 18 AGA member natural gas utilities having facilities that include gas compressor turbines or engines or other oil-filled equipment reported that in the past 5 years (calendar years 2001-2005) they had 10 oily releases from their natural gas systems, only 4 of which were reportable (and duly reported) discharges to waters of the U.S., and none of the 10 equipment releases or 4 reported discharges came from oil-filled equipment. Not all companies have records beyond 5 years, but those that do responded that they have no releases and no reportable discharges of oil from their oil-filled equipment or other intra-state natural gas system operations for the past 10 years or more. The 18 companies responding to the survey operate over 450 units of compression and other oil-filled operating equipment. The majority of this oil-filled equipment is used for compression to move natural gas long

distances through utility-operated intra-state pipelines and high-pressure gas mains or to inject natural gas into rock formations for seasonal underground storage.

The reported oil discharges involved very small amounts of oil as compared to those from large bulk oil storage facilities operated by other industrial sectors. Of the four gas utility reported discharges, one was from a high-pressure pipeline that left a sheen of oily condensate on a wetland after a pipeline incident. Another of the four discharges involved a few gallons of pipeline liquid condensate (oil and water) from an oil water separator that reached a dry wash, but was cleaned before it got to actual surface waters. The third involved a few gallons of oily condensate from a drip pot. The largest involved 70 gallons of oily condensate from an abandoned pipeline that was disturbed during other construction operations.

In addition, two large interstate pipeline members that operate over 600 compressors and other units of oil-filled equipment responded that they had 16 releases of oil from their extensive natural gas interstate transmission systems over the past 5 years (2001-2005), of which 14 were reported as discharges to water. Only four of these pipeline discharges were from oil-filled operating equipment (compressors), and these involved from about a pint to a few gallons per discharge. Two other discharges were caused by hurricanes that flooded compressor stations. This would yield a rate of discharge of 4 discharges per 600 units of oil-filled equipment over a five-year period.

1999 – 2004 Data

AGA conducted a similar survey of AGA members in 2004, including both interstate pipeline operators and local gas utility distribution companies) regarding their oil discharge history. AGA member companies operate a total of 190,771 miles of transmission pipe and 728,506 miles of distribution main, as reported to DOE EIA in 2003. This totals 919,277 miles of transmission pipelines and distribution main pipes. Of this total, the 22 survey respondents operate 306,880 miles of natural gas transmission lines and distribution mains (33% of the AGA total miles).

The responding 22 companies operate a total of 306,880 miles of transmission and distribution pipelines. Two companies experienced 5 discharges of oil that reached waters of the U.S. in the 1999-2003 5-year period, of which 3 only caused a light sheen. *Most had no reported spills of oil at all* in that 5-year period – or "in living memory." *Of the 22 respondents, 5 companies (including one interstate pipeline operator) said they experienced a total 22 contained equipment releases in the last 5 years that were completely contained on site and never reached waters of the U.S.* The other 17 companies responded they had no oil releases from their natural gas operations at all in the past 5 years.

This equates to a rate of *contained* oil spills equal to 0.000072 spills per mile of pipe, and 0.00002 discharges per mile of natural gas distribution and transmission pipeline to waters of the U.S.

Why There are Few Oil Discharges from Gas Utility and Pipeline Systems:

It is not surprising that there are so few oil releases or discharges from natural gas utility and pipeline operations. First, obviously, the main product transported is natural gas, not oil. Oily liquid condensates are entrained in the natural gas, but they constitute only a small fraction of a percentage of the over all volume of product in the pipelines. Second, natural gas system operators follow Department of Transportation (DOT) pipeline safety regulations. The DOT regulations are designed to prevent releases of natural gas (and any entrained liquid hydrocarbon condensates) from the pressurized natural gas transportation system. Companies also have a strong economic motive to prevent leaks of their product, especially given the current high price of natural gas. Third, as in the case of electric utility equipment, natural gas utility operating equipment is closely monitored to ensure its continued operation. Although most facilities are un-manned, the pipes, compressors and other units of operating equipment within the pressurized system are monitored remotely. If a compressor lost lubricating oil for example, the utility gas control room would display this loss of compression, and the utility would be able to respond promptly to contain a release and prevent it from reaching waters of the U.S. Fourth, there is time to respond, because compressors and other units of oil-filled equipment in a natural gas utility system are typically located inside a building or on a bed of gravel, similar to equipment at electrical substations.

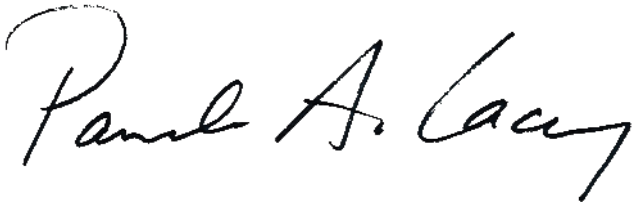
II. Other Comments on the SPCC Guidance: Clarify "Sufficiently Impervious" Design Standard

In the joint USWAG-AGA comments on the SPCC Guidance, we urge EPA to revise the SPCC Guidance to make it clear to inspectors that secondary containment structures such as dikes, berms and retainment walls do not violate the "sufficiently impervious" design standard under 40 C.F.R. section 112.7(c) as long as cleanup occurs in time to prevent a discharge to navigable waters. This clarification is important to AGA member companies that rely on earthen dikes built with soils found on location at thousands of production and gas storage wells, "frac" tanks for pipeline cleanout ("pigging") operations, and other remote sites. Such earthen dikes may not contain oily condensates indefinitely, but they help ensure that the oil can be cleaned up before a discharge to navigable water occurs, as is shown by the discharge history described earlier in these comments. Without this clarification, the October 2007 compliance deadline extension may not allow enough time if companies have to re-build thousands of dikes using clay or other "impervious" materials.

AGA appreciates the opportunity to comment on the SPCC Guidance. If you have any questions, please contact Pamela Lacey at (202) 824-7340.

Respectfully submitted,

American Gas Association



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